

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>ANITA LEVIER</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028(a)(1) (producing false</b>
	<b>:</b>	<b>identification document - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A(a)(1) (aggravated</b>
	<b>:</b>	<b>identity theft- 1 count)</b>
	<b>:</b>	
	<b>:</b>	

**INFORMATION**

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**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

**THE CONSPIRATORS**

At all times relevant to this information:

1. Defendant ANITA LEVIER was employed by the Pennsylvania Department of Transportation (“PennDoT”) as a driver’s license examiner’s assistant, working at PennDoT’s Lawndale Driver License Center in Philadelphia.
2. In her capacity as a driver’s license examiner’s assistant, one of defendant ANITA LEVIER’s responsibilities was to process requests by and produce PennDoT identification cards for eligible individuals who produced the required documentation, including documentation establishing their identities.
3. Co-conspirator Carlos Tejeda Mejia, charged elsewhere, was an acquaintance of defendant ANITA LEVIER.

4. From at least in or about February 2008 to on or about September 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANITA LEVIER**

conspired and agreed with Carlos Tejeda Mejia and others known and unknown to the grand jury to commit an offense against the United States, that is, to knowingly and without lawful authority produce identification documents, in violation of Title 18, United States Code, Section 1028(a)(1).

**MANNER AND MEANS**

It was part of the conspiracy that:

5. Co-conspirator Carlos Tejeda Mejia sold valid birth certificates and social security cards belonging to third persons to customers who were seeking to assume the identity of another person.

6. After providing customers with birth certificates and social security cards belonging to third persons, co-conspirator Carlos Tejeda Mejia brought each customer to PennDoT's Lawndale Driver License Center to receive a PennDoT identification card produced by defendant ANITA LEVIER. Defendant LEVIER produced more than 50 PennDoT identification cards for customers.

7. Defendant ANITA LEVIER received approximately \$1,200 dollars from co-conspirator Carlos Tejeda Mejia for producing PennDoT identification cards for his customers.

**OVERT ACTS**

In furtherance of the conspiracy, defendant ANITA LEVIER and co-conspirator Carlos Tejeda Mejia, and others known and unknown to the grand jury committed the following

overt acts in the Eastern District of Pennsylvania and elsewhere:

8. On or about August 1, 2008, co-conspirator Carlos Tejeda Mejia sold the birth certificate and social security card in the name of “RR” to a customer.

9. On or about August 1, 2008, knowing that the documents did not properly belong to the applicant, defendant ANITA LEVIER produced a PennDoT identification card for co-conspirator Carlos Tejeda Mejia’s customer in the name “RR,” which was not the true identity of the customer to whom the identification card was issued.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

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**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about the August 1, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANITA LEVIER**

knowingly and without lawful authority produced an identification document, that is, a PennDoT identification card in the name “RR,” thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(1) and (c)(3)(A).

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about August 1, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ANITA LEVIER**

knowingly and without lawful authority possessed and used the means of identification of another person, that is, the birth certificate and social security card of “RR,” during and in relation to the fraudulent production of an identification document.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(4).

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**LAURIE MAGID**  
**ACTING UNITED STATES ATTORNEY**